

Name Anne P. Mulligan  
Mailing address Beans CAFE 1101 E. 3rd Ave  
City, State, Zip Anchorage, AK 99501  
Telephone 907-764-5945

RECEIVED  
APR 17 2019  
CLERK, U.S. DISTRICT COURT  
ANCHORAGE, AK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

Anne Patricia Mulligan,  
(Enter full name of plaintiff in this action)

vs. Plaintiff,

Case No. \_\_\_\_\_  
(To be supplied by Court)

Municipality of Anchorage,  
APP,

COMPLAINT UNDER  
THE CIVIL RIGHTS ACT  
42 U.S.C. § 1983

,  
(Enter full names of defendant(s) in this action.  
Do NOT use *et al.*)

(NON-PRISONERS)

Defendant(s).

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1333(a)(3) and 42 U.S.C. § 1983. If you assert jurisdiction under any different or additional authorities, please list them below:

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Anne Patricia Mulligan  
(print your name)

who presently resides at Beans CAFE 1101 E. 3rd Ave. Anchorage, AK 99501  
(mailing address)

were violated by the actions of the individual(s) named below.

2. Defendants (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Officer Joshua Roberts (name) is a citizen of Alaska (state), and is employed as a APP - OFFICER (defendant's government position/title).

This defendant personally participated in causing my injury, and I want money damages.

OR

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

Defendant No. 2, Officer Dan Fletcher (name) is a citizen of Alaska (state), and is employed as a APP OFFICER (defendant's government position/title).

This defendant personally participated in causing my injury, and I want money damages.

OR

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

Defendant No. 3, Unknown White male Police Officer (name) is a citizen of Alaska (state), and is employed as a APP OFFICER (defendant's government position/title).

This defendant personally participated in causing my injury, and I want money damages.

OR

The policy or custom of this official's government agency violates my rights, and I seek injunctive relief (to stop or require someone do something).

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about 4/17/2017, my civil right to  
Freedom from cruel & unusual punishment  
(Date)  
(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)  
was violated by Officer Joshua Roberts  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

On 4/16/2017 - 4/17/2017 OFFICER Joshua Roberts & OFFICER Fletcher were called to carry jewel take by Michael Nelson and by the look on Joshua Roberts he was agitated beyond my complete understanding. He asked to see my ID and I told him my id #. OFFICER Fletcher just stood there doing nothing. OFFICER Roberts assured I was Anne Mulligan because I had 2 identification papers in front of me. One has my name & the other one has my sons name on it. OFFICER Roberts told me that I was being trespass and I said ok I will wait until one of you officers goes and gets it. I was told that is not how it works and I said I will wait until one of the officers goes and gets my trespass because obviously I wasn't leaving. OFFICER Roberts was so agitated & full of hate that he pulled the table aside and threw me into handcuffs causing injury to my left shoulder & upper body. OFFICER Roberts never read me my rights.

Claim 2: On or about 4/17/2017, my civil right to

Freedom from cruel & unusual punishment (Date)

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Officer Evan Fletcher

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

- ON 4/17/2017 OFFICER JOSHUA ROBERTS THREW ME  
INTO HANDCUFFS AND INJURING MY LEFT  
SHOULDER & UPPER BODY IS THEN WHEN  
OFFICER FLETCHER PRESSED ME DOWN, TOLD ME THAT  
BETWEEN HIS BODY & MINE WAS AND DROVE ME  
TO ANCHORAGE JAIL @ WHICH I WAS ASSUMING  
I WAS GOING TO JAIL. IT WAS @ THE ANCHORAGE  
JAIL WHEN ANOTHER APD OFFICER WALKED  
UP TO THE TWO OF US WHILE OFFICER FLETCHER  
WAS TAKING PICTURES OF MY LEFT SIDE OF MY  
FACE BECAUSE IT WAS SWOLLEN. AS WERE MY  
WRISTS. I ASKED FOR MEDICAL ATTENTION FOR MY  
INJURIES @ THE ANCHORAGE JAIL @ WHICH TIME  
HE TOLD ME THAT I NEEDED TO GO TO  
ASPC/CSO FOR MY INJURIES. OFFICER FLETCHER  
TOLD ME THAT ASP/CSO WAS UP THE HILL AND  
THAT HE DIDN'T KNOW THE ADDRESS AND  
THAT I WOULD HAVE TO WALK THERE. THE  
OFFICER FLETCHER HANDED ME MY TRANSPASS  
AND THE OTHER OFFICER DIDN'T HELP ME.  
I WALKED OUT OF THE ANCHORAGE JAIL AND  
WALKED UP THE HILL & COULD NOT FIND  
ASPC/CSO. OFFICER FLETCHER NEVER READ ME MY RIGHTS

Claim 3: On or about 4/17/2017, my civil right to  
freedom from cruel & unusual punishment (Date)  
(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Unknown white male ADD police officer  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

- on 4/17/2017 AFTER JOSHUA ROBERTS threw me
- into handcuffs and injuring my left
- shoulder + upper body IS then when
- OFFICER FLETCHER PRESSED me down, told me that
- his body armor was AND drove me
- to Anchorage jail @ which I WAS ASSUMING
- I WAS GOING TO JAIL. IT WAS @ the Anchorage
- jail when another ADD OFFICER WAITED
- UP TO THE TWO OF US WHILE OFFICER FLETCHER
- WAS TAKING PICTURES OF MY LEFT SIDE OF MY
- FACE BECAUSE IT WAS SWOLLEN. AS WERE MY
- WAISTS. I ASKED FOR MEDICAL ATTENTION FOR MY
- INJURIES @ the Anchorage jail @ which time
- he told me that I needed to go to
- ASPC/CSB for my injuries. OFFICER FLETCHER
- told me that ASP/CSB WAS UP THE HILL AND
- that he didn't know the address and
- that I would have to WALK there. HE
- OFFICER FLETCHER handed me my trespass
- and the other officer didn't help me.
- I WALKED OUT OF THE ANCHORAGE JAIL AND
- WALKED UP THE HILL & COULDN'T FIND
- ASPC/CSB. OFFICER FLETCHER NEVER READ ME MY RIGHTS

#### D. Previous Lawsuits

1. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action, or otherwise relating to your imprisonment?  Yes \_\_\_\_\_ No \_\_\_\_\_

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): Anne P. Mulligan

Defendant(s): Municipality of Anchorage / ACPD

Name and location of court: Superior Court of Anchorage

Docket number: 3AN-19-05296 Name of judge: Tenn. for Henderson

Approximate date case was filed: 2/21/2019 Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_  Still pending

Issues Raised: Habeas Corpus

b. Lawsuit 2:

Plaintiff(s): Anne P. Mulligan

Defendant(s): Municipality of Anchorage

Name and location of court: Superior Court of Anchorage

Docket number: 3AN-19-05297 Name of judge: Tenn. for Henderson

Approximate date case was filed: 2/21/2019 Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_  Still pending

Issues Raised: Habeas Corpus

#### F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 50 million dollars

2. Punitive damages in the amount of \$ 50 million dollars
3. An order requiring defendant(s) to Go to (APD & PAs) restitution
4. A declaration that the APD officers to be removed to jail
5. Other: make restitution to the plaintiffs immediate family which includes grand children, uncles & brother, cousin  
Plaintiff demands a trial by jury. X Yes \_\_\_\_\_ No

### DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage, AK on 4-17-2019  
(Location) (Date)  
Anne Patricia Mulligan  
(Plaintiff's Original Signature)

Anne Patricia Mulligan (Up SE) 4-17-2019  
Original Signature of Attorney (if any) (Date)

Blanks Law  
1101 E. 3rd Ave  
Anchorage, AK 99501  
Attorney's Address and Telephone Number